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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

**MORRIS BICKLEY, MICHAEL D.
 PATTON, RAYMOND GREWE, DENNIS
 VANHORN, and DOUGLAS PUMROY,
 individually and on behalf of all others
 similarly situated,**

Plaintiffs,

v.

**SCHNEIDER NATIONAL CARRIERS,
 INC., a Nevada corporation, and DOES 1 to
 10, inclusive,**

Defendants.

Case No. 3:08-cv-05806-JSW

CLASS ACTION (FRCP 23)

**JOINT STIPULATION AND
 [PROPOSED] ORDER CONTINUING
 DEADLINES**

**Hon. Jeffrey S. White
 Courtroom 2 (17th Floor)**

**Complaint Filed: November 25, 2008
 Trial Date: August 6, 2012**

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1 Plaintiffs Michael Patton, Morris Bickley, Raymond Grewe, Dennis Vanhorn, and
2 Douglas Pumroy (“Plaintiffs”) and Defendant, Schneider National Carriers Inc. (“Defendant”)
3 (hereinafter collectively, the “Parties”), by and through their counsel of record, hereby stipulate
4 and agree as follows:

5 WHEREAS, on May 18, 2011, the Court issued its Order granting the Parties’ Stipulation
6 to File Consolidated Fourth Amended Complaint (Docket No. 90);

7 WHEREAS, on May 18, 2011, the Plaintiffs filed their Consolidated Fourth Amended
8 Complaint (Docket No. 91);

9 WHEREAS, the Consolidated Fourth Amended Complaint added a new named Plaintiff
10 (Pumroy) and several factual allegations and/or edits;

11 WHEREAS, Schneider intends to take further written discovery regarding such new
12 allegations and from the new named Plaintiff;

13 WHEREAS, the Parties agree that, in addition to the maximum number of interrogatories
14 provided in FRCP 33(a), Schneider may issue one additional contention interrogatory to each
15 named plaintiff that requests all facts which support each plaintiff’s contentions as to the new
16 factual allegations in the Fourth Consolidated Amended Complaint.

17 WHEREAS, Schneider needs an additional 30 days built into the current schedule
18 regarding class certification to conduct such discovery;

19 WHEREAS, after the parties have had an opportunity to meet and confer
20 further, Plaintiffs expect to submit a separate request or stipulation regarding the structure of
21 their motion(s) for class certification;

22 WHEREAS, the Parties do not wish to alter the dates currently set for completion of
23 mediation (January 27, 2012) or the further Case Management Conference currently scheduled
24 for February 17, 2012;

25 WHEREAS, the Parties agree that the following dates currently set by the Court’s April
26 1, 2011 case management Order (Docket No. 84) should be continued as follows:

27 Class certification discovery cutoff: From 07/25/11 to 08/24/11;

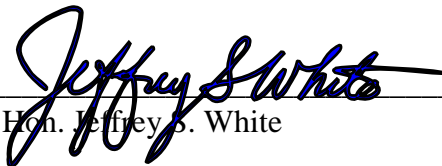
28 Last day to file Class cert. motion: From 08/05/11 to 09/06/11;

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[PROPOSED] ORDER

GOOD CAUSE APPEARING, IT IS SO ORDERED. IT IS FURTHER
ORDERED THAT THE HEARING ON ANY MOTIONS REGARDING CLASS
CERTIFICATION SHALL BE ON January 6, 2012 at _____9 a.m.

DATED: May 26, 2011



Hon. Jeffrey S. White